

Remarks

Reconsideration of this Application is respectfully requested. Claims 1-6, 8-26, and 28-30 are pending in the application, of which claims 1, 10, 17, and 26 are independent. No new matter is embraced by this amendment and its entry is respectfully requested. Based on the remarks set forth below, it is respectfully requested that the Examiner reconsider and withdraw all outstanding rejections.

Rejection under 35 U.S.C. § 103

The Examiner, on page 2 of the Office Action, has rejected claims 1, 2, 4-6, 8-10, 12-17, and 19-25 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,507,371 to Hashimoto *et al.* (hereinafter "Hashimoto") in view of U.S. Patent No. 6,809,749 to Chen *et al.* (hereinafter "Chen"). Applicant respectfully disagrees. Based on the remarks set forth below, Applicant respectfully requests that this rejection be reconsidered and withdrawn.

With regards to independent claim 1, the Examiner states that Hashimoto substantially discloses Applicant's invention. Applicant respectfully disagrees. Hashimoto does not teach or suggest at least the following elements of claim 1:

- a plurality of information tag devices, each of the information tag devices dispersed at various locations of scenes to store identification data for identifying the locations of the scenes;

- a database to store annotation provider information for each of the information tag devices;

- a communication device to communicate with the database, wherein when identification data is transmitted to the database, a network address for an annotation provider associated with the information tag device is transmitted from the database to the communication device; and

a program to be executed by the communication device, the program to enable communication with the annotation provider to obtain an annotation associated with the information tag device and to annotate the digital representation of the scene with the annotation.

Hashimoto does not teach or suggest “a plurality of information tag devices, each of the information tag devices dispersed at various locations of scenes to store identification data for identifying the locations of the scenes.” Instead, Hashimoto teaches a camera having a Global Positioning System (GPS) for determining location. *Hashimoto*, col. 4, lines 55-61. Hashimoto also teaches that it is possible to obtain location information from radio waves output from a station at a predetermined position, satellite, or ground station. *Hashimoto*, col. 4, lines 18-20. Thus, unlike the present invention, which teaches a plurality of information tag devices, each of the information tag devices dispersed at various scenes to store identification data for identifying the location of the scenes, Hashimoto teaches obtaining location information using a GPS from satellite data or radio waves output from a station at a predetermined position or ground station.

The Examiner states that with Hashimoto “[i]t is noted that when the camera is carried to a plurality of places, there would inherently be [a] plurality of information tag devices.” *Office Action*, dated Jan. 26, 2006, p. 3. Applicant respectfully disagrees. Hashimoto teaches a camera with a GPS for obtaining location information. A GPS obtains location data from satellites, not from information tag devices.

The Examiner further states that Hashimoto teaches Applicant’s elements of “a database to store annotation provider information for each of the information tag devices” and “a communication device to communicate with the database, wherein when identification data is transmitted to the database, a network address for an annotation

provider associated with the information tag device is transmitted from the database to the communication device.” Applicant respectfully disagrees.

Unlike the present invention, Hashimoto teaches that the position data enables access to a home page on the Internet. *Hashimoto*, col. 4, lines 61-64. Hashimoto does not teach or suggest “a database to *store annotation provider information for each of the information tag devices*”. The Examiner states that the tables of Hashimoto shown in Fig. 10 represent “a database to store annotation provider information for each of the information tag devices.” Office Action dated Jan. 26, 2006, page 3. Applicant respectfully disagrees. Fig. 10 of Hashimoto shows home-page tables corresponding to the keyword of the area name. *Hashimoto*, col. 6, line 66 – col. 7, line 9. For example, Table 1 lists the home-pages that correspond to the keyword “JAPAN.” *Id.* Furthermore, Hashimoto does not teach annotating the image information with annotations from the home-page. Thus, unlike the present invention, Hashimoto shows a list of home-pages that correspond to keywords, not a database to store annotation provider information for each of the information tag devices.

Hashimoto also does not teach or suggest “a communication device to communicate with the database, wherein when identification data is transmitted to the database, a network address for an annotation provider associated with the information tag device is transmitted from the database to the communication device.” Unlike the present invention, Hashimoto teaches that clicking an image generates the name of an area that serves as a keyword and accesses a home-page corresponding to the keyword. *Hashimoto*, col. 5, line 66 – col. 6, line 4. Thus, instead of transmitting a network address, Hashimoto accesses the home-page corresponding to the keyword.

The Examiner states, on page 3 of the Office Action, and Applicant agrees, that Hashimoto does not teach “a program to be executed by the communication device, the program to enable communication with the annotation provider to obtain an annotation associated with the information tag device and to annotate the digital representation of the scene with the annotation.”

The Examiner further states that:

Chen *et al.* teaches a web server 10 connected to different web clients 310, 320, and 330 via the [I]nternet (figures 1 and 2). [Chen] further teaches FIG. 10 a method for conducting an interactive design conference over the Internet, including receiving and transmitting an annotation of the graphics file to clients. In 1001, the web server 10 is programmed to receive an annotation of the graphics file from any of the web clients 310, 320, 330, and in 1002, transmit the annotation to all participating clients 310, 320, 330 so as to be overlaid over the graphics image (col. 5 line 66 – col. 6 line 10).

Therefore taking the combined teachings of Hashimoto and Chen, it would be obvious to one skilled in the art at the time of the invention to have been motivated to have annotations provided over the [I]nternet from a webpage and used to annotate the images in order for the user to easily annotate the images from a webpage running different platforms.

Office Action, dated Jan. 26, 2006, pp. 3-4.

Applicant respectfully disagrees. Chen does not solve the deficiencies of Hashimoto. With reference to claim 1, Chen does not teach at least the following elements:

- a plurality of information tag devices, each of the information tag devices dispersed at various locations of scenes to store identification data for identifying the locations of the scenes;

- a database to store annotation provider information for each of the information tag devices;

- a communication device to communicate with the database, wherein when identification data is transmitted to the database, a network address for an annotation provider associated with the information tag device is transmitted from the database to the communication device; and

a program to be executed by the communication device, the program to enable communication with the annotation provider to obtain an annotation associated with the information tag device and to annotate the digital representation of the scene with the annotation.

Instead, Chen teaches a method and apparatus for conducting an interactive design conference over the Internet. *Chen*, Abstract, col. 1, lines 29-40. Chen admits web clients communicating through web browsers over the Internet to an interactive design conference and allows a graphics file of a design from one of the web clients to be transmitted to and viewed by the other web clients. *Chen*, Abstract, col. 3, lines 11-29. Chen also teaches that users of the web clients can make annotations of the graphics file and transmit the annotations back to the web server for retransmission to the other web clients. Thus, Chen does not teach “a program to be executed by the communication device, the program to enable communication with the annotation provider to obtain an annotation associated with the information tag device and to annotate the digital representation of the scene with the annotation.” Thus, unlike the present invention which obtains the annotation from an annotation provider web site, Chen teaches that web clients attending the meeting may annotate the graphics file.

Furthermore the combination of Hashimoto and Chen does not teach or suggest Applicant’s invention as recited in claim 1 because neither Hashimoto nor Chen teach or suggest information tag devices, annotation providers, or obtaining annotations from the annotation providers associated with the information tag devices and annotating the digital representation of the scene with the annotations.

Thus, neither Hashimoto nor Chen, alone or in combination, teach or suggest Applicant’s invention as recited in claim 1. For at least the reasons stated above,

independent claim 1, and the claims that depend therefrom (claims 2-6, 8, and 9) are patentable over the cited references of Hashimoto and Chen. Independent claims 10 and 17 recite similar elements to those of claim 1. Thus, for at least the reasons stated above, independent claims 10 and 17, and the claims that depend therefrom (claims 11-16 and 30; and 18-25, respectively), are also patentable over the cited references of Hashimoto and Chen. Applicant respectfully requests that the Examiner reconsider and withdraw the rejection of claims 1, 10 and 17, and the claims that depend therefrom.

The Examiner, on page 6 of the Office Action, has rejected claims 26 and 28 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,396,537 to Squilla *et al.* (hereinafter “Squilla”) in view of U.S. Patent No. 6,507,371 to Hashimoto *et al.* (hereinafter “Hashimoto”). Applicant respectfully disagrees. Based on the remarks set forth below, Applicant respectfully requests that this rejection be reconsidered and withdrawn.

With respect to independent claim 26, the Examiner states, and Applicant agrees that Squilla does not teach Applicant’s element of “an input/output (I/O) device to transfer data between the memory and a communication device, wherein the communication device transfers the identification data to a database, wherein a network address of an annotation provider associated with the information tag device is stored in the database.” The Examiner further states that Hashimoto teaches this element. Applicant respectfully disagrees. As indicated above, Hashimoto does not teach or suggest an annotation provider associated with the information tag device or storing the annotation provider in a database.

Thus, for at least this reason, neither Squilla nor Hashimoto, alone or in combination, teach or suggest Applicant's invention as recited in independent claim 26. For at least the reasons stated above, independent claim 26, and the claims that depend therefrom (claims 28-29) are patentable over the cited references of Squilla and Hashimoto.

The Examiner, on page 8 of the Office Action, has rejected claims 3, 11, and 18 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,507,371 to Hashimoto *et al.* (hereinafter "Hashimoto"), U.S. Patent No. 6,809,749 to Chen *et al.* (hereinafter "Chen") and in further view of U.S. Patent No. 6,567,122 to Anderson *et al.* (hereinafter "Anderson"). Applicant respectfully disagrees. Based on the remarks set forth below, Applicant respectfully requests that this rejection be reconsidered and withdrawn.

Claims 3, 11, and 18 depend from independent claims 1, 10, and 17, respectively, which are patentable over Hashimoto and Chen for the reasons stated above. Furthermore, Anderson does not teach or suggest the features missing from Hashimoto and Chen. Applicant therefore respectfully requests that the Examiner reconsider and withdraw the rejection of dependent claims 3, 11, and 18.

The Examiner, on page 8 of the Office Action, has rejected claim 29 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,396,537 to Squilla *et al.* (hereinafter "Squilla"), U.S. Patent No. 6,507,371 to Hashimoto *et al.* (hereinafter "Hashimoto") and further in view of U.S. Patent No. 6,567,122 to Anderson *et al.* (hereinafter "Anderson"). Applicant respectfully disagrees. Based on the remarks set

forth below, Applicant respectfully requests that this rejection be reconsidered and withdrawn.

Claim 29 depends from independent claim 26, which is patentable over Squilla and Hashimoto for at least the reasons stated below. Furthermore, Anderson does not teach or suggest the features missing from Squilla and Hashimoto. Applicant therefore respectfully requests that the Examiner reconsider and withdraw the rejection of dependent claim 29.

Request for an Examiner Interview

Applicant respectfully requests an Examiner Interview. Applicant respectfully requests that the Examiner contact the Applicant's representative at the number provided to formally set a date and time to conduct the interview.

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all currently outstanding rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Response is respectfully requested.

Respectfully submitted,

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